

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

H.R.H. PRINCE FAISAL BIN KHALID BIN  
ABDULAZIZ AL SAUD,

Plaintiff,

-against-

PIA INVESTMENTS LIMITED, PAKISTAN  
INTERNATIONAL AIRLINES CORPORATION,

Defendants.

07 Civ. 5603 (NRB)(HBP)

**NOTICE OF MOTION  
TO COMPEL ARBITRATION  
OR TO DISMISS THE  
COMPLAINT**

PLEASE TAKE NOTICE that, upon the annexed declaration of Donald I Strauber, dated June 27, 2007, and the exhibits thereto, the annexed declaration of Rashid S. Farookee, dated June 27, 2007, the annexed declaration of Ali Safdar Rezvi, dated June 28, 2007, and upon all the prior pleadings and proceeding herein, Defendants PIA Investments Limited and Pakistan International Airlines Corporation, (collectively, "Defendants,") will move this Court before the Honorable Naomi Reice Buchwald, U.S.D.J., at the United States Courthouse located at 500 Pearl Street, New York, New York on July 25, 2007, at 9:30 a.m., or as soon thereafter as counsel may be heard, for an order:

- 1) Pursuant to 9 U.S.C. §206 and Rule 12(b)(1) of the Federal Rules of Civil Procedure, compelling arbitration of the claims in the Complaint; or
- 2) In the alternative, dismissing the Complaint on the ground of *forum non conveniens*;

and for such other and further relief as the Court deems just and proper.

June 28, 2007

CHADBOURNE & PARKE LLP

By: /s Donald I Strauber

Donald I Strauber (DS-9256)

A Member of the Firm

Attorneys for Defendants PIA Investments

Limited and Pakistan International

Airlines Corporation

30 Rockefeller Plaza

New York, New York 10112

(212) 408-5100

TO:

Mitchell A. Karlan, Esq.  
Gibson, Dunn & Crutcher LLP  
200 Park Avenue  
New York, New York 10166  
Attorneys for Plaintiff